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 HUDSON SKYPORT PLAZA, LLC, a Delaware
 limited liability company, HUDSON SKYPORT
 PLAZA LAND, LLC, a Delaware limited liability
 company, HUDSON PACIFIC PROPERTIES, INC.,
 a Maryland corporation

**Other counsel are listed after the caption*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

CRISTINA MENDOZA,

Plaintiff,

v.
 CITY OF SAN JOSE, PACIFIC GAS &
 ELECTRIC COMPANY, a California
 registered domestic stock corporation,
 HUDSON SKYPORT PLAZA, LLC, a
 Delaware limited liability company,
 HUDSON SKYPORT PLAZA LAND,
 LLC, a Delaware limited liability company,
 HUDSON PACIFIC PROPERTIES, INC.,
 a Maryland corporation, SPIEKER
 PROPERTIES LP, a California limited
 partnership, EOP OPERATING LIMITED
 PARTNERSHIP, LP, a Delaware limited
 partnership, CA – SKYPORT I LIMITED
 PARTNERSHIP, a Delaware limited
 partnership, and DOES 1-100, Inclusive,

Defendant.

CASE NO. 5:17-cv-03579-SVK

JOINT STATUS REPORT

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Attorneys for Defendants
SKYPORT PLAZA OWNERS ASSOCIATION

Pursuant to this Court's Order (Docket No. 106) the parties to the instant action wish to inform the Court of the status of mediation:

A. MEDIATOR SELECTION STATUS AND DISCOVERY TO BE COMPLETED IN ADVANCE OF MEDIATION

Plaintiff's Position on Mediators and Discovery

Plaintiff, along with other parties, has agreed to mediation before Mr. Michael Ornstil. Plaintiff's counsel has contacted Plaintiff to assure that she is available on the mediators open dates.

Plaintiff anticipates the following discovery prior to mediation:

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3 1. WRITTEN DISCOVERY.

4 (a) SKYPORT PLAZA OWNERS ASSOCIATION: Plaintiff is in discussions with
5 counsel for Skyport Plaza Owners Association (“Association”) to determine the scope
6 of written discovery required before mediation. Plaintiff has received documents in
7 Initial Disclosures from the Association. If the Association can attest that these
8 documents represent the entirety of documents in the Association’s possession and
9 control regarding issues of liability, and the ownership, operation, control and
10 maintenance of the area where Plaintiff was injured (and other area within the subject
11 property), Plaintiff will only need to propound a limited number RFPDs as well as
12 RFA’s and Interrogatories to the Association. Plaintiff intends to serve any written
13 discovery on the Association by September 10, 2020.

14 (b) HUDSON DEFENDANTS: Based on the prior discovery responses of the Hudson
15 Defendants, Plaintiff may propound additional interrogatories and RFPDs as well as a
16 set of RFA’s on issues of ownership and control of the subject property as well as
17 Defendant’s affirmative defenses and the relationship between the Hudson Defendants
18 and the Association. If Plaintiff deems additional written discovery is required with
19 respect to the Hudson Defendants, she shall serve that discovery by September 10,
20 2020 so as to allow for mediation to proceed per the current earliest dates available for
21 Mr. Onstil.

22
23 (c) THIRD PARTY SUBPOENAS: Based on a review of documents received from the
24 Association and comparison of those documents with responses from the Hudson
25 Defendants, Plaintiff may issue subpoenas on third parties who performed
26 maintenance and repair work at the subject property.
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2. DEPOSITIONS.

Plaintiff may schedule depositions of each defendant entity (other than PG&E) under F.R.C.P. Rule 30(b)(6). Plaintiff will notice any 30(b)(6) depositions so that they are concluded by the first week in October (assuming Defendants' cooperation in discovery) so as to be fully prepared for mediation.

Hudson Defendants Position on Mediators and Discovery

The Hudson Defendants' counsel proposed Michael Ornstil for mediator. Counsel for PG&E and Association and Plaintiff informed all counsel that Mr. Ornstil is acceptable. On August 18, 2020, Hudson Defendants counsel provided the following available mediation dates for himself and Mr. Ornstil: November 10-13, 17-18, and 30, 2020.

The Hudson Defendants anticipate conducting the following discovery before the mediation: written discovery to the Association, depositions of Plaintiff's treating physicians, and meeting and conferring with Plaintiff's counsel regarding updating the Plaintiff's damages.

Skyport Plaza Owners Association's Position on Mediation and Discovery

On August 17, 2020, counsel for the Skyport Owners Association informed all counsel that the Association accepts the Hudson Defendants' proposal of Michael Ornstil as mediator. Counsel for the Association will provide Mr. Ornstil's mediation availability dates to the Association and will meet and confer with all counsel to agree to a mediation date. On August 18, 2020, Plaintiff provided the Association with the prior discovery between the parties in this matter. Counsel for the Association will review this discovery to determine what additional discovery it needs to conduct. The Association reserves its right to propound discovery on all parties.

1 Dated: August 18, 2020

ROPERS MAJESKI PC

2
3 By: /s/ David M. McLaughlin

4 DAVID M. McLAUGHLIN
5 JAMIE MARTINEZ
6 Attorneys for Defendants
7 HUDSON SKYPORT PLAZA, LLC, a
8 Delaware limited liability company,
9 HUDSON SKYPORT PLAZA LAND,
10 LLC, a Delaware limited liability company,
11 HUDSON PACIFIC PROPERTIES, INC.,
12 a Maryland corporation

9 Dated: August 18, 2020

DERBY, McGUINNESS & GOLDSMITH,
LLC

11 By: /s/ Anthony Goldsmith

12 ANTHONY GOLDSMITH, ESQ.
13 Attorneys for Plaintiff
14 CHRISTINA MENDOZA

14 Dated: August 18, 2020

ANDREWS LAGASSE BRANCH + BELL
LLP

16 By: /s/ Danté R. Taylor

17 DAVID J. GIBSON
18 DANTÉ R. TAYLOR
19 Attorneys for Defendant
20 SKYPORT PLAZA OWNERS
21 ASSOCIATION
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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1, I hereby attest I, David M. McLaughlin, attorney with Ropers Majeski PC, received the concurrences of Counsel in the filing of this document.

/s/ David M. McLaughlin

DAVID M. McLAUGHLIN

Ropers Majeski Kohn & Bentley
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